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13 *Attorneys for Plaintiffs*

14  
15 **UNITED STATES DISTRICT COURT**  
16 **CENTRAL DISTRICT OF CALIFORNIA**

17  
18 JANE DOE 1, an individual, et al.,  
19 Plaintiffs,

20 vs.

21 JAIME S. SCHWARTZ, MD, an  
22 individual, et al.,  
23 Defendants.

Case No.: 2:25-CV-00898-GW-SSC

**CLASS ACTION**

**NOTICE OF ERRATA RE:  
MOTION TO CONSOLIDATE  
CASES AND TO APPOINT  
INTERIM CLASS COUNSEL**

Date: June 26, 2025  
Time: 8:30 a.m.  
Courtroom 9D, 9th Floor

1 **TO THIS HONORABLE COURT, ALL PARTIES, AND THEIR ATTORNEYS**  
2 **OF RECORD:**

3 PLEASE TAKE NOTICE that the Declaration of Damion Robinson in Support  
4 of Motion to Consolidate Cases and to Appoint Interim Class Counsel (ECF No. 34-2)  
5 attached an incorrect draft of the Robinson Markevitch & Parker LLP firm resume as  
6 Exhibit 1. A correct copy is attached hereto.

7 Dated: June 3, 2025

Respectfully submitted,  
ROBINSON MARKEVITCH & PARKER LLP

9 By: /s/ Damion Robinson  
10 Damion D. D. Robinson  
11 David Markevitch  
12 Jimmie Davis Parker

BOUCHER LLP  
Raymond P. Boucher  
Shehnaz M. Bhujwala

14 THE LEW FIRM APC  
Charles S. Lew (Cal. Bar No. 227495)  
15 Isaiah T. Artest (Cal. Bar No. 320326)

16 *Attorneys for Plaintiffs Jane Does 1-16*

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**EXHIBIT 1**

## FIRM RESUME

Robinson Markevitch & Parker LLP (“RMP”) is a boutique California firm, focusing on complex litigation in state and federal courts. Our lawyers come from diverse backgrounds and have over 50 years of combined experience handling high stakes litigation for individuals and Fortune 500 companies alike. Our primary practices include consumer class actions, business litigation, and employment matters. Our partners have successfully prosecuted cases resulting in verdicts and settlements of over \$250 million on behalf of consumers, investors, businesspeople, and employees.

We are dedicated to managing complex disputes with creativity and passion and with our clients’ goals firmly in mind. We work cooperatively with firms across the state and nationally, including subject matter experts, and are experienced in working with multi-firm teams to achieve the best possible outcomes. Although we are small, we focus on the fundamentals of legal advocacy, and pride ourselves on providing top-quality representation to all of our clients.

### Our Practice

#### **Consumer Class Actions**

A large part of our work is seeking justice on behalf of consumers who fall victim to fraud and other illegal practices by large corporations. Our attorneys have successfully litigated large class actions and putative class actions, involving tens or hundreds of thousands of victims, in state and federal courts around California.

We have been at the forefront of consumer class action litigation in the state. Our partner, Jimmie Davis Parker, has been responsible for some of the largest—if not the largest—class actions in state history involving violation of California statutes governing tenant security deposits. Through his work, Mr. Parker has recovered tens of millions of dollars for over 40,000 renters whose security deposits were systematically misappropriated by large landlords. In 2024, he reached apparently the largest settlement in state history in a security deposit case, securing \$12.5 million in total recovery for the class, representing over 135% of class damages.

#### **Business Litigation**

We represent executives, investors, and business owners in a wide variety of business disputes, including partnership and fiduciary duty disputes, derivative actions, business tort cases, and enforcement of commercial contracts. Our partners have been involved in complex business cases across the country in state, federal, and bankruptcy courts, including claims involving billions of dollars in damages claimed.

Our technical experience allows us to handle high-tech cases with confidence and clarity. Before going to law school, partner David Markevitch was a practicing chemist and inventor on several patents. He subsequently spent more than a decade litigating product liability cases involving complex scientific, medical and engineering issues. Damion Robinson has served as outside general counsel to multiple technology startups ranging from consumer products to online education. By understanding our clients’ businesses and technology, we have effectively managed cases involving state-of-the-art technologies, such as cryptocurrency, artificial intelligence, and cellular telephone hacking.

#### **Employment**

We maintain an active employment practice representing both management and employees in cases involving whistleblowing, wrongful termination, and wage and hour matters, including class and representative (PAGA) actions. Our broad experience in employment litigation allows us to handle large and complex cases efficiently and effectively.

Our employment class action practice has included class and representative proceedings across the state and nationally, involving thousands of employees. We have successfully coordinated and navigated multi-case wage and hour disputes, with multiple groups of counsel, alleging tens of millions of dollars in unpaid wages and penalties. We have also prosecuted cases on behalf of victims of systemic racism and sexism at some of the largest tech companies in the world, as well as litigating complex whistleblower and trade secrets claims involving novel technology and classified and Top Secret government information.

### **Our Lawyers**

#### **Damion Robinson**

Mr. Robinson has broad-ranging experience in individual litigation, class/representative actions, and business disputes. He is often brought in by other attorneys and firms to manage complex litigation, including class actions and disputes involving multiple proceedings. He has assisted clients in obtaining well over \$200 million in verdicts and settlements, and has participated in the defense of claims totaling over \$7 billion.

Mr. Robinson is a 2007 graduate of U.C.L.A. School of Law. After law school, Mr. Robinson was a judicial law clerk to the Honorable David O. Carter in the United States District Court for the Central District of California. He then worked as a litigation associate at a major international firm, Sullivan & Cromwell LLP. Before co-founding RMP in 2023, Mr. Robinson was a partner of two boutique California firms and national litigation firm Diamond McCarthy LLP.

Throughout his career, Mr. Robinson's practice has focused on complex litigation, including multi-state and international litigation, class actions, shareholder derivative actions, and other representative actions. Some notable cases include the following:

- *In re Washington Mutual, Inc.*, United States Bankruptcy Court, District of Delaware, No. 08-12229 (MFW): Represented acquirer of failed bank in bankruptcy proceedings, including with respect to fraudulent transfer claims in excess of \$6 billion.
- *Kimberly Benson, et al., v. JP Morgan Chase Bank, N.A.*, Central District of California No. CV 09-5272 MEJ: Counsel for defendant in a putative class action alleging aiding and abetting of a \$200 million securities fraud; successfully obtained dismissal of all claims, which was affirmed on appeal.
- *San Antonio Fire & Police Pension Fund v. Amylin Pharmaceuticals, Inc., et al.*, Delaware Chancery, No. 446-VCL: Defense counsel in a shareholder class action alleging that standard change-of-control provisions in \$140 million debt financing agreements disenfranchised shareholders. The case resolved favorably after an expedited trial.
- *Xin Chen, et al. v. GHP Management Corporation, et al.*, Los Angeles Superior Court, Case No. BC713402: Appointed co-lead counsel with Jimmie Davis Parker to the class in this case challenging the systematic and illegal withholding of rental security deposits.
- *Robert Ross v. AT&T Mobility, LLC*, Northern District of California, Case No. 19-cv-06669-JST: Counsel to plaintiff in an action involving "SIM swap" hacking of AT&T mobile phones to bypass dual-factor authentication, allowing hackers to steal more than \$1 million in cryptocurrency.
- *Michael Ho v. Marathon Patent Group, Inc., et al.*, Central District of California, Case No. 21-0339: Counsel to plaintiff in this action alleging breach of a non-disclosure agreement relating to a cryptocurrency "mining" transaction with a publicly traded firm. The case eventually resulted in a jury verdict in the client's favor of almost \$139 million, which was substantially upheld after post-trial motions.
- *Geragos v. Abelyan*, 88 Cal. App. 5th 1005 (2023): Successfully obtained dismissal of claims against an attorney in a case involving alleged extortion and illegal surreptitious recording. The case resulted in a comprehensive published opinion, which has been cited

in leading California treatises, including *The Rutter Group Practice Guides*, *Witkin Summary of California Law*, and *California Jurisprudence*.

Mr. Robinson has also done significant *pro bono* work on behalf of the less fortunate. Alongside the ACLU and Public Counsel, he represented a class of hundreds of immigration detainees with serious mental disorders in *Franco-Gonzalez v. Holder*, Central District of California, Case No. 10-2211, which established a right to representation in immigration proceedings. Mr. Robinson has received awards and acknowledgement for his *pro bono* work, including the Equal Justice in Advocacy Award from the ACLU of Southern California.

### **David Markevitch**

Mr. Markevitch is an experienced civil litigator and trial attorney. He manages RMP's employment litigation practice and handles complex disputes involving discrimination, harassment, and whistleblower retaliation, as well as class and representative matters for both plaintiffs and defendants. He has represented executives and companies in the high-tech industry, including pursuing claims against major tech companies and representing startup founders in disputes involving patented artificial intelligence technology.

Mr. Markevitch is a 2007 graduate of U.C.L.A. School of Law. Before attending law school, Mr. Markevitch was a research chemist in the pharmaceutical industry and is named as an inventor on numerous patents. After graduating, he worked at prominent plaintiff firms, including Girardi & Keese LLP, mass-torts firm Kaiser Gornick LLP (formerly Levin Simes Kaiser & Gornick), and litigation boutique Affeld Grivakes LLP. Mr. Markevitch co-founded Robinson Markevitch & Parker LLP in 2023.

He has represented hundreds of clients in complex product-liability litigations involving medical devices and pharmaceutical drugs, including Multi-District Litigation (MDL) proceedings and California state court coordinated (JCCP) proceedings. While he was at Kaiser Gornick, the firm served on plaintiffs' committees in multiple nationwide MDLs, including committees charged with discovery involving millions of documents and complex electronically stored information (ESI), liability and technical expert and theory development, and settlement. Mr. Markevitch was personally involved in developing liability theories and evidence, working with medical and technical experts, and preparing potential bellwether cases for litigation.

In tandem, Mr. Markevitch worked with nearly 1,000 individual clients from intake to settlement administration, personally acquainting himself with each client and their medical histories, helping them through the pain, uncertainty, and suffering resulting from catastrophic injuries. As a result of these efforts, the results obtained for his clients far surpassed those of most of the hundreds of other firms around the country pursuing claims in the mass tort proceedings.

Representative matters include:

- DePuy ASR Hip Implant Product Liability Litigation.
- DePuy Pinnacle Hip Implant Product Liability Litigation.
- Wright Medical Hip Implant Product Liability Litigation.
- Biomet Hip Implant Product Liability Litigation.
- Zimmer Durom Hip Implant Product Liability Litigation.
- Testosterone Replacement Therapy Product Liability Litigation.
- Reglan/Metoclopramide Product Liability Litigation.
- Actos Product Liability Litigation.
- Gadolinium Product Liability Litigation.



In 2017, Mr. Markevitch co-chaired a trial resulting in a verdict of more than \$12,000,000, representing one of the largest product liability verdicts in the California.

### **Jimmie Davis Parker**

Mr. Parker has 18 years of experience in litigation and has devoted his practice to defending consumer rights against unscrupulous and illegal business practices. He has been lead counsel in multiple consumer class actions, which have resulted in over \$25 million in recoveries for tens of thousands of consumers. He has successfully litigated hundreds of cases, including against high-profile defendants such as the Republic of Iraq, Fortune 100 companies, and a sitting government official. Mr. Parker is on the forefront of consumer class litigation in the landlord-tenant field in California and obtained some of the largest settlements in security-deposit class actions in state history. He is currently co-counsel to several putative classes consisting of hundreds of thousands of California renters against some of the largest institutional landlords in the country.

Mr. Parker is a 2007 Graduate of the University of San Diego School of Law. Before joining RMP, he worked at national defense firm, Gordon & Rees, representing Fortune 500 companies in toxic tort and other complex actions. He then ran his own plaintiff-focused practice for more than a decade.

Representative matters include the following:

- *Yu v. Gleiberman Properties, Inc.*, San Diego Superior Court, Case No. 37-2021-00008418: Lead plaintiff's counsel in a settled class action alleging violations of Civil Code § 1950.5 (security deposit misappropriation) and Civil Code § 671 (excessive late fees). The case settled for \$9.8 million in total recovery, which has been preliminarily approved and is pending final approval.
- *Xin Chen, et al. v. GHP Management Corporation, et al.*, Los Angeles Superior Court, Case No. BC713402: Co-lead counsel with Mr. Robinson to the certified class of approximately 33,000 California renters against one of the largest landlords in Southern California, multi-billionaire Geoffrey Palmer. The case alleged systematic, fraudulent misappropriation of security deposits. Mr. Parker successfully obtained class certification over opposition from the more than 20 defendants. The case eventually settled for \$12.5 million in total economic recovery, including \$10 million in cash, representing roughly 135% of the class damages.
- *Parker, et al. v. Mark Steven Schmidt, et al.*, San Diego Superior Court, Case No. 37-2015-0017514: Lead counsel for plaintiffs in a class action alleging violations of Civil Code § 1950.5 (unlawful withholding of security deposits), which resolved for \$5 million in total recovery.
- *Haro, Jr., et al. v. FedEx Ground Package System, Inc., et al.*, San Diego Superior Court, Case No. 37-2015-00012264: Lead counsel in a class action of delivery drivers alleging overtime violations.
- *Marie Ali v. County of Los Angeles*, Central District of California, Case No. CV08-07627: Co-counsel in the representation of 206 Los Angeles County Child Social Workers in a collective action under the Fair Labor Standards Act seeking recovery of unpaid overtime. Settled for \$2.5 million in total recovery.
- *Bladh v. Brenner Associates, et al.*, San Diego Superior Court, Case No. 37-2008-00081732: Second Chair in a ten-day jury trial culminating in a nearly unanimous verdict in favor of 24 individual plaintiffs against their former employer for various wage and hour violations. The jury awarded over 90% of the total damages sought.

Mr. Parker continues to actively litigate class action cases in state and federal court. Some of his notable current cases are as follows:

- *Norman, et al. v. Essex Property Trust, et al.*, San Diego Superior Court, Case No. 37-2022-00038519: Putative class action regarding violations of Civil Code § 1950.5, involving over 250,000 putative class members across hundreds of apartment complexes.
- *Ronnie Brooks, et al. v. Greystar Real Estate Partners, LLC*, Southern District of California, Case No. 23-cv-1729-LL-VET: Putative class action regarding violations of Civil Code § 1950.5, which involves nearly 500 apartment complexes and hundreds of thousands of renters across California.
- *Watkins v. AvalonBay Communities, Inc., Southern District of California*, Case No. 3:25-cv-01119-AJB-BLM: Putative class action involving violations of Civil Code § 1950.5 implicating hundreds of thousands of putative class members across hundreds of California apartment complexes.

Mr. Parker has also represented several victims in the Boy Scouts sex abuse proceedings.

**Matt Dhaiti**

Mr. Dhaiti joined RMP in 2025. He works on the firm's consumer class action cases. Mr. Dhaiti is a 2022 graduate of Stanford Law School and previously worked at a prominent international firm in its regulatory practice.

**Karley Britton**

Ms. Britton joined RMP in 2025. She is a recent graduate from Rutgers University School of Law. Ms. Britton focuses on the firm's employment practice.



**CERTIFICATE OF SERVICE**

I, the undersigned, certify that I filed the foregoing document using the Court's CM/ECF electronic filing platform. I am informed that filing through the CM/ECF Platform results in notice to all interested parties in this action.

I declare under penalty of perjury under the laws of the United States that the above is true and correct.

Executed on June 3, 2025 at Los Angeles, California.

\_\_\_\_\_  
[Print Name]

\_\_\_\_\_  
[Signature]

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